

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter the Application of Spire Missouri, Inc)
d/b/a Spire for a Certificate of Convenience and)
Necessity to Construct, Install, Own, Operate, Maintain,) **File No.: GA-2024-0100**
and Otherwise Control and Manage a Natural Gas)
Distribution System in Cass County Missouri as an)
Expansion of its Existing Certified Areas)

**MOTION FOR EXTENSION OF TIME
TO FILE STAFF RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension of Time to File Staff Recommendation*, states as follows:

1. On September 22, 2023, Spire Missouri Inc., (hereafter “Spire” or “the Company”) filed an application requesting a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide natural gas service in Cass County, Missouri as a further expansion of Spire’s existing certified area, and also requested a waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).

2. On September 22, 2023, the Commission issued an *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation*. In its *Order*, the Commission directed notice of the application and set a deadline for interested parties to intervene. The Commission received no intervention requests.

3. Staff has and will continue to issue data requests to aid in its review, provide feedback, and continue discussions with Spire. However, Spire's responses to Staff's initial rounds of data requests have spurred the need for further investigation and additional discovery.

4. Further, as is common practice in cases regarding the expansion of existing natural gas distribution systems, Staff requests additional time to review the information provided thus far and determine if further information is needed.

5. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from Spire, and complete its investigation, Staff requests an additional 30 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

6. Counsel for Spire and the Office of the Public Counsel have been contacted regarding this motion and neither party objects to the granting of an extension of time in this matter.

7. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and prays the Commission grant Staff an additional 30 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 7th day of November, 2023, to all counsel of record.

/s/ Carolyn H. Kerr